



Culver City Fire Department

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**ORIGINAL
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MICHAEL L. OLSON
Fire Chief

May 22, 1987

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Mr. William J. Tricarico, Secretary
Federal Communications Commission
1919 "M" Street, N.W.
Washington, D.C. 20554

Re: The Impact of Advanced
Television Technologies
on Local Television
Broadcasting

Dear Mr. Tricarico:

The City of Culver City submits its Comments in the Matter
of the Petition for Notice of Inquiry RM-5811.

Enclosed for filing in the above-captioned proceeding are
an original and eleven (11) copies of The City of Culver
City's comments.

Respectfully submitted,

LORAN D. DECKER
Communications Systems Supervisor

LDD/jmr
Attachment

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FILE
[Signature]

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In The Matter Of)
)
The Petition to Institute) RM-5811 ✓
Inquiry on Issues Relating to)
the Introduction of Advanced)
Television Technologies)

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COMMENTS BY
THE CITY OF CULVER CITY, CALIFORNIA

MAIL BRANCH

The City of Culver City, California, submits these Comments in response to the Petition for Notice of Inquiry. Comments of the City of Culver City address the specific inquiries of this proceeding with regard to the impact on the City of Culver City.

INTRODUCTION

The City of Culver City supports the broadcasters' efforts requesting the Commission to permit the study of advanced television technologies, welcoming the introduction of advanced technology making television service more spectrally efficient. The television broadcast industry has utilized the 6 MHz without a significant improvement in technology efficiency. The City of Culver City agrees with AMST that there is a need for the inquiry process. The inquiries should be restricted to those that will not cause further delay to the FCC's program of allocating additional shared UHF spectrum. Furthermore, the relief created by the Commission's statutory obligation to accord priority to the vital needs of public safety agencies will have no substantial impact on the ability to respond to AMST's requested inquiry concerning advanced television technologies.

DISCUSSION

The Petitioners point out that the broadcasting industry continues to

employ the same 6 MHz-wide television channels agreed upon by the Radio Manufacturers' Association in 1936. During the 51-year period since, there has been little improvement in reducing the fundamental spectrum requirements of over-the-air television broadcasting. The land mobile radio community has developed improved and more efficient technology to reduce the required bandwidth transmission requirements.

The Japan Broadcast Corporation (NHK), owned and operated by the Japanese government, is the leading proponent of HDTV. Local broadcasters in the United States are unable to transmit the HDTV signal in the 6 MHz channels presently allocated by the Commission. During the last 15 years, however, according to the Petitioners, NHK has made no effort to try to develop an HDTV transmission system which could be transmitted in a 6 MHz-wide channel. Furthermore, despite the fact that HDTV has been under study for 15 years, not one HDTV system has been developed that would not make the millions of television sets currently in the marketplace obsolete.

Cable Television (CATV) may be a more suitable medium for the broadcast of the Japanese standard HDTV in the United States, since CATV presently has ample radio spectrum to deliver an HDTV and NTSC picture, and the capability to initiate HDTV service without abandoning (or providing converters to) consumers with National Television System Committee (NTSC) only receivers. The decision to allow CATV to provide HDTV service would preclude tremendous amounts of capital expenditures by broadcasters to upgrade existing transmitters, the need for television manufacturers to spend exorbitant amounts of money to develop receivers for existing television sets and to increase the marketing of newly manufactured HDTV sets. Selection of CATV as the medium would also prevent direct or structural market intervention by the FCC. Additionally, it would lessen

the foreseen litigation resulting from proposed changes in the Commission's allocation policies and the broadcasters' repeated attempts to gain increased allocations of frequencies despite the Congressional mandate to accord public safety priority in spectrum selection. The Commission has a legal obligation to ensure that adequate spectrum is available to State and local public safety agencies. Sections 1 and 332(a) of the Communications Act clearly identify public safety as a statutory public interest consideration. These sections clearly direct the FCC to manage radio spectrum in a way that promises the safety of life. (47 USC. SECT. 151, 332(a) [1976 & Supp. 1983]).

The City of Culver City favors the Advanced Television Systems Committee (ATSC) taxonomy, including the following proposed advancements: 1) Improved NTSC systems, 2) enhanced 525-line systems, and 3) HDTV systems. ATSC has certainly developed a workable plan for the improvement of broadcast television as it is presently known in the United States. The plan has several alternative solutions to HDTV and it would certainly point to a co-existence between the Land Mobile and Broadcast Television industries. The City of Culver City recommends the Commission seriously consider the over-the-air transmission system developed by Dr. William Glenn that would be compatible with existing NTSC receivers. It is not a necessity that U.S. consumers be given the option of having HDTV at the expense of public safety spectrum needs. The needs of public safety have steadily increased due to the sophistication of the criminal element and increases in population, especially in the Southern California area. The improvement of the existing NTSC picture quality would be welcomed by all consumers in the United States; however, the improvement of picture quality afforded even by the compressed format (Multiple Sub-Nyquist Sampling

Encoding, or MUSE) HDTV may place the value of property (the options for consumers in the market) over the value of human lives and their ultimate safety and preservation. The City of Culver City is not in complete opposition to the need for increased spectrum by the broadcasters. The NYIT and Phillips HDTV systems are viable alternatives to upgrading the existing broadcast system, making the discontinuance of service or the requirement for converters to be attached to every existing set avoidable. The City of Culver City is aware that these alternative technologies will require the use of additional spectrum in addition to the currently utilized 6 MHz channels. Movement into the 12.2-12.7 GHz bands is certainly an option. A small portion of the terrestrial broadcast band could be allocated to the broadcasters for HDTV research and development, while allowing the existing public safety users to operate continuously and harmoniously.

CONCLUSION

The local broadcast system, in the City of Culver City's view, will not be destroyed by the lack of Commission intervention, and a substantial portion of Americans will not be deprived of television service. Current broadcast standards as known will most probably survive the introduction of HDTV as they have withstood the appearance of CATV, the achievement of "critical mass" by the videocassette recorder and the emergence of Direct Broadcast Satellite. The broadcasters are certainly justified in seeking FCC action in the determination of the appropriate regulatory response.

The present spectrum allocation structure should be left intact, and the consumer video delivery marketplace will surely determine the system of its choice. The City of Culver City feels that the present television broadcast system will survive the transition to HDTV or an alternative and

improved medium. The marketplace will certainly function properly without inducements from the broadcasters or other parties to purchase any new form of television transmission. Consumer desire and the level of discretionary income available will vastly determine the outcome of all forthcoming television technologies.

The force generating the transition to HDTV is not fueled by free market entities but by NHK seeking to create a market for HDTV in the United States. The balance of trade sanctions in the U.S. are already strained by Japanese imports. The petition stated that local broadcasters were never envisioned to have a role in HDTV in Japan, with the exception of providing programming for one of the nationwide satellite HDTV channels. The City of Culver City is of the opinion that the Commission shall not intervene in the marketplace. The City of Culver City, California, recommends that the Commission provide consideration for the Petition for the Notice of Inquiry confined to the 6 MHz bandwidth, and to continue with the proposals in the UHF-TV/Land Mobile Sharing proceeding.

Respectfully submitted,



LORAN D. DECKER
Communications Systems Supervisor

LDD/jmr